

1 BRIAN FAHLING, WSBA #18894
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4 Kenmore, WA 98028
5 (425) 802-7326

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7 **UNITED STATES DISTRICT COURT**
8 **EASTERN DISTRICT OF WASHINGTON**

9 NICHOLAS ROLOVICH,

10 Plaintiff,

11 v.

12 WASHINGTON STATE
13 UNIVERSITY, an agency of the
14 State of Washington; PATRICK
15 CHUN, Director of Athletics for
16 Washington State University, in his
17 individual capacity; and JAY
18 INSLEE, Governor, in his official
19 capacity,

20 Defendants.

NO. 2:22-cv-00319

MOTION FOR ERIC KNIFFIN TO
APPEAR PRO HAC VICE

2/22/23
WITHOUT ORAL ARGUMENT

21 Pursuant to Local Rule 83.2(c)(1), Plaintiff hereby applies for Eric
22 Kniffin, of Lewis Roca to be permitted by this Court to appear as counsel pro
23 hac vice in this matter on behalf of Plaintiff Nicholas Rolovich (“Plaintiff”).

24 1. Eric Kniffin is an attorney practicing with the law firm of Kniffin
25 Law PLLC, 102 S. Tejon St., Suite 1100, Colorado Springs, CO 80903;
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1 2. Eric Kniffin was admitted to the State Bar of Colorado and the
2 following courts on the following dates:
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- 4 a. Colorado, #48016, admitted July 28, 2014
5 b. District of Columbia, #999473, admitted February 17, 2011
6 c. Illinois, #6280383, admitted November 6, 2003
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8 3. Eric Kniffin will be associated in this case with Brian Fahling,
9 WSBA #18894, 8124 NE 166th St, Kenmore, WA 98028, telephone number
10 (425) 802-7326, who has been admitted to the United States Eastern District of
11 Washington. Eric Kniffin will serve as co-counsel in this matter and will sign
12 all pleadings, motions, and other papers prior to filing.
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14 4. Plaintiff Nicholas Rolovich will be filing a Motion to Remand and
15 Eric Kniffin's participation before this Court in support of that motion is
16 essential for the effective representation of Plaintiff. Also, if this matter is not
17 remanded, the motions practice, discovery, and if necessary, trial, will be
18 significant in scale, and will require Eric Kniffin's full participation in the
19 litigation.
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1 5. Eric Kniffin is a member in good standing in all of the above-
2 referenced courts. Eric Kniffin does not have any pending disciplinary actions
3 and has never been subject to any disciplinary sanctions by any court or bar
4 association.
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6 Based upon the foregoing, Plaintiff respectfully requests that the Court
7 permit Eric Kniffin to appear *pro hac vice* for Plaintiff in this matter.
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9 DATED this 30th day of December, 2022.

10 **LAW OFFICE OF BRIAN FAHLING**

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12 By: /s/ Brian Fahling
13 Brian Fahling WSBA #18894
14 *Attorneys for Plaintiff*
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CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of December, 2022, I electronically filed the forgoing MOTION FOR ERIC KNIFFIN TO APPEAR PRO HAC VICE, with the Clerk of Court using the CM/ECF System, which in turn automatically generated a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF system. The NEF for the foregoing specifically identifies recipients of electronic notice. I hereby certify that none of the represented parties are non-CM/ECF participants.

LAW OFFICE OF BRIAN FAHLING

By: /s/ Brian Fahling
Brian Fahling